

# MacGill

Matthew Ciulla <matthew.ciulla@macgilllaw.com>

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**From:** Brandon Boulware <[Brandon@boulware-law.com](mailto:Brandon@boulware-law.com)>  
**Sent:** Wednesday, May 27, 2020 4:34 PM  
**To:** Varon, Jay N. <[JVaron@foley.com](mailto:JVaron@foley.com)>; Matt Dameron <[matt@williamsdirks.com](mailto:matt@williamsdirks.com)>  
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**Subject:** RE: For our meet and confer discussions on Monday and Tuesday

**\*\* EXTERNAL EMAIL MESSAGE \*\***

Jay –

Case 4:19-cv-00332-SRB Document 1128-3 Filed 09/07/23 Page 1 of 4

<https://mail.google.com/mail/u/0/?ik=2b464a3495&view=pt&search=all&permmsgid=msg-f:1776115117922452601&simpl=msg-f:1776115117922452601>

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Sitzer Plaintiffs select the following custodians from the list that you provided for ReeceNichols and BHHS Kansas City:

- James Manning
- Robert Frazier
- Melissa Greene

Thanks.

**Brandon Boulware | Attorney**

**Boulware Law**

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**From:** [JVaron@foley.com](mailto:JVaron@foley.com) <[JVaron@foley.com](mailto:JVaron@foley.com)>

**Sent:** Sunday, May 10, 2020 5:30 PM

**To:** Brandon Boulware <[Brandon@boulware-law.com](mailto:Brandon@boulware-law.com)>; Matt Dameron <[matt@williamsdirks.com](mailto:matt@williamsdirks.com)>

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**Subject:** For our meet and confer discussions on Monday and Tuesday

Brandon/ Matt: Please see the attached letter along with a document containing some discussion of the Definitions to your Document Requests and an Employee Roster for the Missouri subsidiaries for the past five years. Believe me when I say we intended to get this to you much earlier in the day. All I can say is we did our best but apologize for the delay in getting it to you..—Jay

**Jay N. Varon**

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### 3 attachments



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22K



image003.jpg  
8K

